

**OFFICIAL FILE**  
**ILLINOIS COMMERCE COMMISSION**

**ORIGINAL**

00-0606  
ILLINOIS  
Docket No. COMM. FILE COMMISSION

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SEP 14 10 33 AM '00

SCC Communications Corp.

Application for a Certificate of  
Authority to Provide Telecommunications  
Services in the State of Illinois

CHIEF CLERK'S OFFICE

**APPLICATION FOR CERTIFICATE TO BECOME A  
TELECOMMUNICATIONS CARRIER**  
(Use additional sheets as necessary.)

**GENERAL**

1. Applicant's Name(including d/b/a, if any)

FEIN # 84-0796285

SCC Communications Corp.

Address: Street 6285 Lookout Road

City Boulder State/Zip Colorado 80301

2. Authority Requested: (Mark all that apply)

XX 13-403 Facilities Based Interexchange

       13-404 Resale of Local and/or Interexchange

XX 13-405 Facilities Based Local

SCC does not provide long distance toll services or local exchange dial tone services, does not intend to provide such services, and does not seek authority to provide such services. However, in order to provide the services described herein, SCC will require use of certain interexchange and local exchange facilities owned and/or operated by other telecommunications providers.

3. Request for waivers/variances: In applications for local exchange service authority under Sections 13-404 or 13-405, waivers of Part 710 and of Section 735.180 of Part 735 are generally requested. In applications for interexchange service authority under Sections 13-403 and 13-404, waivers of Part 710 and Part 735 are generally requested. Please indicate which waivers Applicant is requesting and explain why Applicant is requesting each waiver/variance.

XX Part 710 Uniform System of Accounts for Telecommunications Carriers

XX Part 735 Procedures Governing the Establishment of Credit, Billing, Deposits, Termination of Service and Issuance of Telephone Directories for Local Exchange Telecommunications Carriers in the State of Illinois

XX Section 735.180 Directories

       Other

(1)

SCC does not provide long distance toll services or local exchange dial tone services, does not intend to provide such services, and does not seek authority to provide such services. Thus, Parts 735 and 735.180 do not apply to SCC. In addition, because SCC does not provide the aforementioned services, many aspects of Part 710 do not apply to SCC's business. SCC maintains its records in accordance with Generally Accepted Accounting Principles.

4. For all applicants requesting local exchange authority under Section 13-404 or Section 13-405, please complete the following:

- (a) the Standard Questions for Applicants Seeking Local Exchange Service Authority found in Appendix A of this document;

Attached

- (b) the 9-1-1 Questions for Applicants Seeking Local Exchange Service Authority found in Appendix B of this document;

Attached

- (c) the Financial Questions for Applicants Seeking Local Exchange Service Authority found in Appendix C of this document; and

Attached

- (d) if applicable, the Prepaid Service Questions for Applicants Seeking Local Exchange Service Authority found in Appendix D of this document.

SCC does not provide long distance toll services or local exchange dial tone services, does not intend to provide such services, and does not seek authority to provide such services. Thus, the questions contained in Appendix D are not applicable to SCC.

5. In what area of the state does the Applicant propose to provide service?

All areas

6. Please attach a sheet designating contact persons to work with Staff on the following:

- a) issues related to processing this application
- b) consumer issues
- c) customer complaint resolution
- d) technical and service quality issues
- e) "tariff" and pricing issues
- f) 9-1-1 issues
- g) security/law enforcement

Please identify each contact person's (i) name, (ii) title, (iii) mailing address, (iv) telephone number, (v) facsimile number, and (vi) e-mail address.

Please see Exhibit A hereto.

7. Please check type of organization?

☐ Individual  
☐ Partnership

☒ Corporation

Date corporation was formed September 1993

In what state? Delaware

\_\_\_\_ Other (Specify)

8. Submit a copy of articles of incorporation and a copy of certificate of authority to transact business in Illinois.

Please see Exhibit B hereto.

9. List jurisdictions in which Applicant is offering service(s).

As an agent for incumbent local exchange carriers, competitive local exchange carriers, integrated communications providers, and wireless carriers, SCC provides database management services nationwide. In addition, SCC has been selected by the Texas Commission on State Emergency Communication as the state's designated provider of 9-1-1 management service. SCC was granted a Service Provider Certificate of Operating Authority (No. 60317) by the Public Utility Commission of Texas on January 13, 2000. Applications for a certificate of authority to provide telecommunications services are currently pending in Colorado, Maryland, Montana, and Washington.

10. Has the Applicant, or any principal in Applicant, been denied a Certificate of Service or had its certification revoked or suspended in any jurisdiction in this or another name?

\_\_\_\_ YES (Please provide details)    XX NO

11. Have there been any complaints or judgments levied against the Applicant in any other jurisdiction?

\_\_\_\_ YES    XX NO

If YES, describe fully. \_\_\_\_\_

12. Has Applicant provided service under any other name?

\_\_\_\_ YES    XX NO

If YES, please list. \_\_\_\_\_

13. Will the Applicant keep its books and records in Illinois? \_\_\_\_ YES    XX NO

If NO, permission pursuant to 83 Ill. Adm Code Part 250 needs to be requested.

SCC maintains its books and records at its headquarters in Boulder, Colorado. While SCC intends to provide its 9-1-1 SafetyNet<sup>SM</sup> services nationwide, including in the State of Illinois, SCC will not necessarily have a physical presence in the state. Rather, SCC will provide services using facilities located throughout the country. SCC will maintain an agent for service of process in Illinois, and materials relating to SCC's services in the state, including applicable tariffs, will be posted on SCC's Internet web site — <http://www.scc911.com>.

For the foregoing reasons, SCC respectfully requests permission to keep its books and records outside the State of Illinois, pursuant to Part 250 of the Commission's regulations.

**MANAGERIAL**

14. Please attach evidence of the applicant's managerial and technical resources and ability to provide service. This may be in either narrative form, resumes of key personnel, or a combination of these forms.

Please see Exhibit C hereto.

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15. List officers of Applicant.

George Heinrichs – President & CEO

Michael D. Dingman, Jr. – Chief Financial Officer

16. Does any officer of Applicant have an ownership or other interest in any other entity which has provided or is currently providing telecommunications services?        YES XX NO

If YES, list entity. \_\_\_\_\_

17. How will Applicant bill for its service(s)? (At a minimum, describe how often the Applicant will bill for service and details of the billing statement.)

SCC's billing mechanism will be determined on an individual contract basis via service agreements/contracts with SCC's customers.

18. How does Applicant propose to handle service, billing, and repair complaints? (At a minimum, describe Applicant's internal process for complaint resolution, the complaint escalation process, the timeframe and process by which the customer is notified by Applicant that they may seek assistance from the Commission?)

SCC operates its Public Safety Operations Center 24 hours per day, 7 days per week, to be the initial point of contact for service, billing, and repair complaints. Professional call takers will direct incoming calls to the appropriate SCC support personnel, who will determine appropriate remedial measures.

19. Will personnel be available at Applicant's business office during regular working hours to respond to inquiries about service or billing? XX YES        NO

Please see response to Question 18 above.

20. What telephone number(s) would a customer use to contact your company?

(877) 856-7504

21. Will Applicant abide by all Federal and State slamming and cramming laws pursuant to Section 13-902 of the Public Utilities Act and Section 258 of the 1996 Telecommunications Act?

XX YES        NO

22. Please describe applicant's procedures to prevent slamming and cramming of customers?

Not Applicable. SCC does not provide long distance toll services or local exchange dial tone services, does not intend to provide such services, and does not seek authority to provide such services. If and when SCC does provide such services, SCC will adopt procedures to prevent slamming and cramming, and SCC will describe such procedures to the Commission.

23. If granted authority to operate as a local exchange carrier, will the applicant abide by the following 83 Illinois Administrative Code Parts: 705, 710, 720, 725, 730, 735, 755, 756, 757, 770, and 772?

       YES XX NO (If no, please provide an explanation.)

As indicated in SCC's response to Question 3 above, SCC respectfully requests that the Commission waive Parts 710, 735, and 735.180 of its regulations. In addition, SCC does not provide long distance toll services or local exchange dial tone services, does not intend to provide such services, and does not seek authority to provide such services. Thus, as discussed in SCC's responses to the Questions posed in Appendix A hereto, many of

the Parts listed above do not currently apply to SCC. If and when SCC provides such services, SCC will comply with applicable regulations.

24. Is Applicant aware that it must file tariffs prior to providing service in Illinois?

XX YES        NO

#### FINANCIAL

25. Please attach evidence of Applicant's financial fitness through the submission of its most current income statement and balance sheet, or other appropriate documentation of applicant's financial resources and ability to provide service.

Please see Exhibit D hereto.

#### TECHNICAL

26. Does Applicant utilize its own equipment and/or facilities? XX YES        NO

If YES, please list the facilities Applicant intends to utilize. Also include evidence that Applicant possesses the necessary technical resources to deploy and maintain said facilities:

Please see Exhibit E hereto.

If NO, which facility provider(s)'s services does the Applicant intend to use?

SCC does not provide long distance toll services or local exchange dial tone services, does not intend to provide such services, and does not seek authority to provide such services. However, in order to provide the services described herein, SCC will require use of certain interexchange and local exchange facilities owned and/or operated by other telecommunications providers.

27. Please describe the nature of service to be provided (e.g., operator services, internet, debit cards, long distance service, data services, local service, prepaid local service).

Aggregation and transport of traditional and non-traditional emergency calls. SCC does not provide long distance toll services or local exchange dial tone services, does not intend to provide such services, and does not seek authority to provide such services. However, in order to aggregate and transport emergency calls, SCC will require the same sort of interconnection and collocation afforded to certified Competitive Local Exchange Carriers ("CLECs"). SCC respectfully requests, therefore, that the Commission find that SCC is entitled to the rights of interconnection, collocation, resale, and access to unbundled network elements enjoyed by CLECs under the Telecommunications Act of 1996.

28. Will technical personnel be available at all times to assist customers with service problems?

XX YES        NO

Please see response to Question 18 above.

29. If Applicant intends to provide payphone service, will the equipment utilized comply with FCC requirements and Finding (9) of the Commission Order entered in Docket No. 84-0442 on June 11, 1986, including, but not limited to: (a) touch dialing; (b) access to 9-1-1 and "0" operator dialing without use of a coin; (c) rules governing use of payphones by disabled persons; (d) ability to complete local and long-distance calls; (e)

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unlimited duration for local calls; and (f) a message explaining the telephone's general operations, dialing instructions for emergency assistance, payphone owner's name, method of reporting service problems and method of receiving credit for faulty calls? \_\_\_\_\_ YES \_\_\_\_\_ NO

Not Applicable. SCC does not intend to provide payphone service.

David Huberman  
(Signature of Applicant)

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VERIFICATION

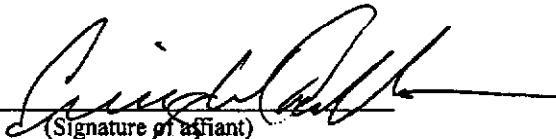
This application shall be verified under oath.

OATH

State of Colorado )  
County of Boulder )ss

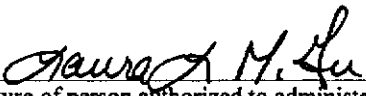
Craig W. Donaldson makes oath and says that he is Vice President and General Counsel  
of SCC Communications Corp.

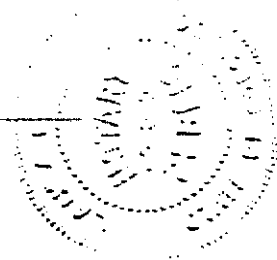
that he has examined the foregoing application and that to the best of his knowledge, information, and belief, all statements of fact contained in the said application are true, and the said application is a correct statement of the business and affairs of the above-named applicant in respect to each and every matter set forth therein.

  
(Signature of affiant)

Subscribed and sworn to before me, a Notary Public/ Laura L. McGee  
(Title of person authorized to administer oaths)

in the State and County above named, this 13<sup>th</sup> day of September, 2000.

  
(Signature of person authorized to administer oath)



**Standard Questions for Applicants Seeking Local Exchange Service Authority**

1. Is your company seeking any waivers or variances of certain Commission rules and regulations in this proceeding that pertain to local exchange service? Please provide evidence as to why your company is seeking any waiver or variance.

**Yes. As indicated in SCC's response to Application Question 3, SCC respectfully requests that the Commission waive Parts 710, 735, and 735.180 of its regulations.**

2. Will your company comply with 83 Illinois Administrative Code Part 772, Pay-Per-Call Services, including Part 772.55(a)(1), Billing and Part 772.100(d) Notices?

**SCC does not provide pay-per-call services, does not intend to provide such services and does not seek authority to provide such services. Thus, Part 772 is not currently applicable to SCC. If and when SCC does provide such services, it will comply with Part 772.**

3. Will your company comply with 83 Illinois Administrative Code Part 705, Preservation of Records of Telephone Utilities?

**SCC does not provide long distance toll services or local exchange dial tone services, does not intend to provide such services, and does not seek authority to provide such services. Thus, it does not appear that Part 705 is currently applicable to SCC. SCC will comply with Part 705 to the extent it applies to SCC.**

4. Will your company abide by 83 Illinois Administrative Code Part 735, "Procedures Governing the Establishment of Credit, Billing, Deposits, Termination of Service and Issuance of Telephone Directories for Telephone Utilities in the State of Illinois"?

**SCC does not provide long distance toll services or local exchange dial tone services, does not intend to provide such services, and does not seek authority to provide such services. Thus, Part 735 is not currently applicable to SCC. If and when SCC does provide such services, it will comply with Part 735.**

5. Who will provide customer repair service for your company?

**SCC will provide customer repair service through its Public Safety Operations Center, which operates 24 hours per day, 7 days per week, 365 days per year.**

6. How many people does the company employ?

**SCC currently has 382 employees.**

7. Will your company meet the requirements as they pertain to the Telephone Assistance Programs imposed by Sections 13.301 and 13.301.1 of the Illinois Public Utilities Act and 83 Illinois Administrative Code Part 757?

**SCC does not provide long distance toll services or local exchange dial tone services, does not intend to provide such services, and does not seek authority to provide such services. SCC does not own, operate, or maintain any local access lines, and SCC does not have end-user telephone subscribers. Thus, the aforementioned regulations are not currently applicable to SCC. If and when SCC provides such services, it will comply with the aforementioned regulations.**

8. Will your company solicit, collect, and remit the voluntary contributions from its telephone subscribers to support the Telephone Assistance Programs?

**SCC does not provide long distance toll services or local exchange dial tone services, does not intend to**

(8)



provide such services, and does not seek authority to provide such services. SCC does not own, operate, or maintain any local access lines, and SCC does not have end-user telephone subscribers from which to solicit and collect voluntary contributions. Accordingly, the aforementioned regulations are not currently applicable to SCC. If and when SCC provides such services, it will comply with the aforementioned regulations.

9. Does your company plan on filing to become an Eligible Telecommunications Carrier?

No. SCC does not provide long distance toll services or local exchange dial tone services, does not intend to provide such services, and does not seek authority to provide such services. SCC does not own, operate, or maintain any local access lines, and SCC does not have any end-user telephone subscribers. If and when SCC provides such services, it will assess whether to become an Eligible Telecommunications Carrier.

10. Does the company realize that it will not be able to receive any of the federal reimbursements for the Lifeline and Link Up Programs if it is not an eligible carrier?

Yes.

11. Will your company offer all of the waivers associated with the Universal Telephone Service Assistance Programs (UTSAP)?

SCC does not provide long distance toll services or local exchange dial tone services, does not intend to provide such services, and does not seek authority to provide such services. SCC does not own, operate, or maintain any local access lines, and SCC does not have any end-user telephone subscribers. Thus, the Universal Telephone Service Assistance Programs are not currently applicable to SCC. If and when SCC provides such services, it will comply with the aforementioned regulations.

12. Will your company abide by the regulations as prescribed in 83 Illinois Administrative Code Part 755, "Telecommunications Access for Persons with Disabilities," 83 Illinois Administrative Code Part 756 "Telecommunications Relay Service," and Sections 13-703 of the Illinois Public Utilities Act?

SCC does not provide long distance toll services or local exchange dial tone services, does not intend to provide such services, and does not seek authority to provide such services. Thus, the aforementioned regulations are not currently applicable to SCC. If and when SCC provides such services, it will comply with the aforementioned regulations.

13. Will the company's billing system be able to distinguish between resale and facilities based service for the collection of the ITAC line charge?

SCC does not provide long distance toll services or local exchange dial tone services, does not intend to provide such services, and does not seek authority to provide such services. SCC does not own, operate, or maintain any local access lines, and SCC does not have any end-user telephone subscribers. Thus, the ITAC line charge is not currently applicable to SCC. If and when SCC provides such services, it will collect the ITAC line charge in accordance with the Commission's regulations.

14. Has your company signed and return the Universal Telephone Assistance Corporation ("UTAC") and the Illinois Telecommunications Access Corporation ("ITAC") to Commission staff?

SCC does not provide long distance toll services or local exchange dial tone services, does not intend to provide such services, and does not seek authority to provide such services. SCC does not own, operate, or maintain any local access lines, and SCC does not have any end-user telephone subscribers. Thus, the UTAC and ITAC are not currently applicable to SCC. If and when SCC provides such services, it will comply with the Commission's regulations regarding UTAC and ITAC.

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15. How does your company plan to solicit customers once it begins to provide local service?

SCC does not provide long distance toll services or local exchange dial tone services, does not intend to provide such services, and does not seek authority to provide such services. Rather, SCC 9-1-1 SafetyNet<sup>SM</sup> services are telecommunications services that permit a Public Safety Answering Point (PSAP) designated by the authorized 9-1-1 administrative entity to receive emergency calls placed by dialing the number 9-1-1, emergency calls originated by personal safety devices terminating at a designated service bureau and requiring public safety assistance, and emergency calls from non-traditional sources such as personal data assistants, wireless communications devices, and the Internet. The services include the use of an enhanced coordinate routing call management system and may include the facilities required to transport and deliver the calls to the appropriate 9-1-1 selective routing tandem for delivery to the PSAP.

Using a direct sales force and direct mail campaigns, SCC will market SCC 9-1-1 SafetyNet<sup>SM</sup> services to local exchange carriers, wireless services providers, telematics-type services providers, and 9-1-1 administrative entities. In addition, SCC will participate in industry fora and trade shows and will place advertisements and articles with industry publications.

16. Has your company provided service under any other name?

No.

17. Have any complaints or judgements been levied against the company? (Instate, out-of-state, or FCC).

No.

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